

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

QUINCY MUTUAL FIRE INSURANCE	)
COMPANY,	)
	)
Plaintiff,	)
	)
v.	)
	)
UNITED STATES OF AMERICA,	)
	)
Defendant.	)
	)

---

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

Pursuant to Local Rule 16.1(D), the parties to this action, plaintiff Quincy Mutual Fire Insurance Company, by and through their undersigned counsel, and the defendant United States of America, by and through their undersigned counsel of record, hereby submit this Joint Statement.

**1. Proposed Plan for Discovery:**

The parties propose that discovery proceed as follows:

- a. Automatic disclosure to be served by February 9, 2005
- b. All fact discovery requests to be served by February 23, 2005
- c. All fact depositions to be noticed by March 30, 2005
- d. Fact depositions to be completed by May 31, 2005
- e. Rule 26(A)(2)(B) disclosure of trial experts by plaintiff served by June 8, 2005
- f. Rule 26(A)(2)(B) disclosure of trial experts by defendant served by June 22, 2005
- g. Expert Depositions concluded by July 29, 2005

**2. Schedule For Filing of Motions**

Any dispositive motions to be filed by August 15, 2005. Oppositions to be filed within 14 days thereafter.

**3. Certification**

The parties respectfully request that they be granted leave to file the necessary Rule 16.1(D)(4) certifications on or before January 26, 2005.

**4. Magistrate Judge**

The parties consent to have this matter referred to a Magistrate Judge for all purposes.

Respectfully submitted:

By the parties,

The Plaintiff,

Quincy Mutual Fire Insurance Company  
By Its Attorney

The Defendant,

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Paul Valentino

PAUL VALENTINO, Esq.  
O'KEEFE & GALE  
180 West Central Street  
Natick, MA 01760  
(508) 655-0000

/s/ Mark T. Quinlivan

MARK T. QUINLIVAN  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3606

Dated: January 20, 2005